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12 Attorneys for Defendant,  
13 *Albertson's LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KELLY DENINO, an Individual, ) 2:19-cv-00540-JAD-JCF

VCF

**Plaintiffs,**

vs.

**ERRATA TO STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

ALBERTSON'S LLC, a foreign limited liability company; DOE GENERAL MANAGER, an individual; DOES I-X; and ROE BUSINESS ENTITIES XI-XX, inclusive.

**(First Request)**

### Defendants.

COMES NOW, Plaintiff KELLY DENINO, by and through her counsel CLAGGETT & SYKES LAW FIRM and, and ALBERTSON'S LLC, by and through its counsel BACKUS, CARRANZA & BURDEN, hereby stipulate to the extension of all discovery deadlines by ninety (90) days. The Parties propose the following discovery plan:

#### **DISCOVERY COMPLETED TO DATE**

The Parties have attended the mandatory FRCP 26 conference and exchanged initial disclosures of documents and individuals with knowledge of the facts pertaining to the claims set forth in this matter; including supplements thereto. The Parties have also propounded written

1 discovery requests, including interrogatories, requests for production, and requests for admission.

2 **DISCOVERY TO BE COMPLETED**

3 The Parties seek to disclose liability and damages experts; taking depositions of the same.  
4 Further, Defendant seeks to depose Plaintiff, her medical providers and identified percipient  
5 witnesses. Plaintiff seeks to depose Defendant's FRCP 30(b)(6) witness and identified percipient  
6 witnesses.  
7

8 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

9 Despite the good faith efforts of the parties to comply with the Court's discovery  
10 deadlines, both Parties have scheduling conflicts and need additional time for additional medical  
11 records and expert designations. This request is made in good faith; not for the purpose of delay.  
12

13 **PROPOSED NEW DISCOVERY DEADLINES**

14 **Expert Disclosure Deadline:**

15 Currently: August 26, 2019

16 Proposed: November 25, 2019

17 **Interim Status Report:**

18 Currently: August 26, 2019

19 Proposed: November 25, 2019

20 **Rebuttal Expert Disclosure Deadline:**

21 Currently: September 25, 2019

22 Proposed: December 26, 2019

23 **Discovery Deadline:**

24 Currently: October 25, 2019

25 Proposed: January 27, 2020

26     ///  
27  
28

1                   **Deadline to File Dispositive Motions:**

2                   Currently:    November 22, 2019

3                   **Proposed:    February 28, 2019**

4                   **Pre-Trial Order Deadline:**

5                   2020

6                   Currently:    December 20, 2019

7                   **Proposed:    March 19, 2020**

8                   If dispositive motions are filed, the deadline  
9                   for filing the joint pretrial order will be suspended  
10                  until 30 days after decision on the dispositive  
11                  motions or further court order.

12                  DATED: this 5th day of August, 2019

13                  DATED: this 5th day of August, 2019

14                  **CLAGGETT & SYKES LAW FIRM**

15                  By: /s/ Sean K. Claggett

16                  Sean K. Claggett, Esq.

17                  Geordan G. Logan, Esq.

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24                  Attorneys for Plaintiff

15                  **BACKUS, CARRANZA & BURDEN**

16                  By: /s/ Jack P. Burden

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25                  Attorneys for Defendant

26                  **ORDER**

27                  IT IS SO ORDERED.

28                  DATED: this 6th day of August, 2019.



29                  **UNITED STATES MAGISTRATE JUDGE**

30                  DATED this 5th day of August, 2019.

31                  Respectfully Submitted,

32                  **BACKUS, CARRANZA & BURDEN**

33                  By: /s/ Jack P. Burden

34                  Jack P. Burden, Esq.

35                  Jacquelyn Franco, Esq.

36                  3050 South Durango Drive

37                  Las Vegas, NV 89117

38                  Attorneys for Defendant *Albertson's LLC*

**CERTIFICATE OF SERVICE**

I am a resident of and employed in Clark County, Nevada. I am over the age of 18 years and not a party to the within action. My business address is: 3050 South Durango Drive, Las Vegas, Nevada, 89117.

On August 5, 2019, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

**VIA U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**VIA FACSIMILE:** by transmitting to a facsimile machine maintained by the attorney or the party who has filed a written consent for such manner of service.

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**BY E-MAIL:** by transmitting a copy of the document in the format to be used for attachments to the electronic-mail address designated by the attorney or the party who has filed a written consent for such manner of service.

**BY ELECTRONIC MEANS:** by electronically filing and serving with the court's vendor.

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
Sean K. Claggett, Esq.		<input type="checkbox"/> Personal service
William T. Sykes, Esq.		<input type="checkbox"/> Email service
Geordan G. Logan, Esq.		<input type="checkbox"/> Fax service
CLAGGETT & SYKES LAW FIRM		<input type="checkbox"/> Mail service
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made. Amelia Aguirre  
An employee of BACKUS, CARRANZA & BURDEN